1 2	AVRAMSKI LAW, PC Boris Avramski, Esq. Nevada Bar No. 11350		
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4	Phone: (702) 522-1808 Fax: (702) 685-3625		
5	bkhelpvegas@yahoo.com Attorney for Plaintiff		
6	Autoritey for Frankfir		
7	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA		
8	EDYTA GRYGLAK, formerly known as EDYTA A. FROMKIN,		
9	Plaintiff,	Case No.: 2:17-cv-01514-JCM-NJK	
10	vs.	STIPULATION AND ORDER	
11	HSBC BANK USA, N.A., as trustee for WELLS FARGO HOME EQUITY ASSET-	EXTENDING PLAINTIFF'S DUE DATE TO RESPOND TO MOTION	
12	BACKED CERTIFICATES, Series 2006-3, by its Attorney-in-fact WELLS FARGO BANK,	TO DISMISS	
13	N.A., WELLS FARGO BANK, N.A., and WELLS FARGO ASSET SECURITIES	FIRST REQUEST	
14	CORPORATION,	Motion Filed August 14, 2017	
15	Defendants.		
16	Plaintiff Edyta Gradals and Defendants	HSDC Dank USA N.A. as trustee for Walls	
17	Plaintiff Edyta Gryglak and Defendants HSBC Bank USA, N.A., as trustee for Wells		
18	Fargo Home Equity Asset-Backed Certificates, Series 2006-3, by its Attorney-in-fact Wells		
19	Fargo Bank, N.A., Wells Fargo Bank, N.A. and Wells Fargo Asset Securities Corporation		
20	(collectively, "Wells Fargo") agree as follows:		
21	WHEREAS on August 14, 2017, Wells Fargo filed a motion to dismiss the second, third,		
22	fourth, and fifth causes of action of the Complaint (Doc. No. 10) (the "Motion");		
23	WHEREAS the due date for plaintiff Edyta Gryglak to respond to the Motion was		
24	Monday August 28, 2017;		
25	WHEREAS this is Ms. Gryglak's first request for an extension of time, which is		
	1	necessary due to the vacation and work schedules of her counsel;	
26		es of her counsel;	
26 27	necessary due to the vacation and work schedule	es of her counsel; s extension, which is not intended to cause any	
262728	necessary due to the vacation and work schedule		

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1	WHEREAS Ms. Gryglak is filing this stipulation and proposed order one day late, on		
2	August 29, 2017 rather than August 28, 2017, due to excusable neglect on the part of her		
3	counsel;1		
4	IT IS HEREBY STIPULATED AS FOLLOWS:		
5	1. The due date for Ms. Gryglak's	response to the Motion is extended by two weeks,	
6	from August 28, 2017 to September 11, 2017.		
7	Dated this 29 th day of August 2017.		
8			
9	AVRAMSKI LAW, PC Counsel for Plaintiff	SNELL & WILMER L.L.P. Counsel for Defendants	
10	/s/ Boris Avramski	/s/ Blakeley E. Griffith	
11			
12	Boris Avramski, Esq. Nevada Bar No. 11350	Blakeley E. Griffith, Esq. Nevada Bar No. 12386	
13	AVRAMSKI LAW, PC 4640 W. Charleston Blvd.	SNELL & WILMER L.L.P. 3883 Howard Hughes Parkway	
14	Las Vegas, NV 89102 Phone: (702) 685-3618	Las Vegas, NV 89169 Phone: (702) 784-5200	
15	Fax: (702) 664-0555 bkhelpvegas@yahoo.com	Fax: (702) 784-5252 bgriffith@swlaw.com	
16			
17	IT IS SO ORDERED:		
18	Xellus C. Mahan		
19	UNITED STATES DISTRICT JUDGE	<u> </u>	
20			
21	DATED: August 30, 2017		
22			
23			
24			
25			
26	In particular, on August 28, 2017. Ms	. Gryglak's lead counsel, Edward Griffith, had just	
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¹ In particular, on August 28, 2017, Ms. Gryglak's lead counsel, Edward Griffith, had just returned from a vacation and was traveling in Florida for a court hearing in another case; this stipulation and proposed order was not prepared and filed until the following day due to a misunderstanding between Mr. Griffith and his staff.